

EXHIBIT 1

From: [Hinger, Cathy](#)
To: ["Maura Grossman"](#)
Cc: [Weaver, Kurt](#); [Bruno, Victoria](#); [Ames, Lela](#); [Mervis, Michael T.](#); [Gallagher, Katie](#); [Baker, Jeremy](#); [audley@chapman.com](#); [Mia D. D'Andrea](#); [Nemith, Mike](#); [Vinti, Baldassare](#); [Roche, Jennifer L.](#); [Alladi, Om V.](#); [Gordon, Amy B.](#)
Subject: RE: Craigville Telephone Co. et al v. T-Mobile USA, Inc. - Plaintiffs' Motion to Restore Rule 30(b)(6) Time and to Compel TMUS to Reproduce Prepared Rule 30(b)(6) Witnesses on Matters 12(a) and 41
Date: Saturday, February 24, 2024 2:48:32 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Dr. Grossman:

The following communication is a joint email from Plaintiffs and TMUS mutually agreed by both parties:

Plaintiffs and TMUS have met and conferred regarding several discovery matters related to completion of deposition discovery set forth in letter motions and emails exchanged with you between February 19 - 22, 2024. The Parties mutually intend to present an agreed path towards completion of fact discovery and remaining depositions that takes into account that there are outstanding motions the Special Master will not likely be able to resolve in time for the Parties to complete deposition discovery before March 18th. The Parties have reached the following proposed agreements and seek your input on whether such solutions are acceptable to the Special Master, and your guidance on implementation of them:

1. The Parties agree Plaintiffs will take the Rule 30(b)(1) deposition of TMUS employee Manoj Kumar on March 21, 2024, out of time, to accommodate schedules of the witness and counsel.
2. The Parties agree that, absent good cause, no other depositions will be taken out of time and after the March 18th close of discovery that have not already been noticed or disclosed by the Parties to one another. These depositions include:
 - i. Plaintiffs' Rule 30(b)(1) Deposition of TMUS employee Satish Pachalla (Noticed for March 1)
 - ii. Plaintiffs' Rule 30(b)(6) Deposition of Inteliquent (Noticed for March 13, but the Parties acknowledge this may need to be taken out of time given Plaintiffs' pending unresolved Motion to Compel against Inteliquent)
 - iii. Plaintiffs' Rule 30(b)(1) Deposition of Inteliquent Employee John Bullock (Noticed for March 14, but the Parties acknowledge this may need to be taken out of time given Plaintiffs' pending unresolved Motion to Compel against Inteliquent)
 - iv. Plaintiffs' Rule 30(b)(1) Depositions of Inteliquent Employees Tim Schneberger and Mary Hocheimer (Noticed for March 15, but the Parties acknowledge this may need to be taken out of time given Plaintiffs' pending unresolved Motion to Compel against Inteliquent)
 - v. Plaintiffs' Rule 30(b)(1) Deposition of TMUS Employee Manoj Kumar (to be noticed for March 21, subject to Special Master and/or Court approval of the agreements contained herein)
 - vi. Plaintiffs' Deposition of Remaining TMUS 30(b)(6) Witnesses, William Rowe, Rusty Huntsman, Tom Cast, and any others that

- may result from pending unresolved TMUS 30(b)(6) disputes (to be scheduled per next agreement below)
- vii. Plaintiffs' potential deposition of third-party intermediate provider Peerless, to whom Plaintiffs recently issued a subpoena for documents, and to which Peerless has not yet responded, if a records custodian Declaration or any clarifying testimony cannot be obtained from Peerless.
 - viii. TMUS's Rule 30(b)(1) Deposition of CTC former employee Mark Roach (proposed by Plaintiffs for March 12, 13 or 14)
 - ix. TMUS's Requested Additional 30(b)(6) time with AdamsWells, to be noticed if the Special Master grants TMUS's pending motion (the Parties acknowledge this may need to be taken out of time given TMUS's pending unresolved motion).
 - x. Continuation of TMUS's Rule 30(b)(6) Deposition of CTC if any (depending on the Special Master's rulings on TMUS's revised Topics 22 and 23 or any other discovery motions) (the Parties acknowledge this may need to be taken out of time given the timing of any such decisions by the Special Master).
 - xi. TMUS's Rule 30(b)(1) Deposition of Peoples Telecommunications, LLC Employee Jennifer Leach prior to the March 18 close of discovery unless the witness is unavailable before then.
 - xii. TMUS's Rule 30(b)(1) Deposition of Lakeland Communications Employee Derek Ayd prior to the March 18 close of discovery unless the witness is unavailable before then.
3. The Parties agree that, absent good cause, no additional written discovery may be served.
4. Plaintiffs and TMUS will both withdraw their letter briefs concerning Plaintiffs' Motion to Compel Mr. Kumar's deposition.
5. With respect to the dispute concerning Plaintiffs' Request for Expedited Consideration of their Motion to Restore 30(b)(6) Time and to Compel Re-Designation of Witnesses in advance of upcoming depositions ("Plaintiffs' Motion to Restore"), the Parties agree to resolve the scheduling aspect of that dispute as follows:
- a. Plaintiffs will consent to TMUS's request to file its opposition on March 8, and Plaintiffs will file their reply, if any, by March 12, but reserve the right to advise the Special Master whether they prefer to proceed to hearing without a reply;
 - b. The Parties agree the 30(b)(6) deposition sessions for TMUS employees Rowe, Huntsman and Cast will be deferred until after the Special Master resolves Plaintiffs' Motion to Restore 30(b)(6) Time. The Parties agree that these remaining 30(b)(6) depositions may be scheduled out of time if the Special Master is not able to resolve the dispute prior to March 18th and with sufficient time to schedule the remaining TMUS 30(b)(6) sessions thereafter. To that end, by March 1, 2024, TMUS will provide proposed deposition dates to Plaintiffs after March 18 and will make a good faith effort to propose dates that are within a 1-2 week period after March 18 based on witness availability. If the dispute is not resolved by such rescheduled dates, the Parties will work together in good faith to schedule other dates for the depositions based on witness availability.
6. Outstanding Motions: The Parties identified the following known discovery

motions that remain for briefing:

- a. Plaintiffs' Motion challenging certain of TMUS's Privilege Claims – the parties have agreed to submit simultaneous 5 page briefs on March 4, 2024 with simultaneous replies of no more than 2.5 pages on March 11, 2024.
 - b. TMUS advised Plaintiffs it may file a motion to compel further amendments to Plaintiffs' Initial Disclosures.
 - c. The Parties reserve their rights to challenge confidentiality designations pursuant to the procedures allowed under the Amended Agreed Confidentiality Order at any time and as certain filings return to the public docket.
7. The Parties reserve their rights with respect to the unresolved dispute concerning potential post-fact discovery depositions to address authenticity and admissibility foundation for documents.
8. The Parties reserve their rights to raise any new discovery disputes which may arise out of any ongoing discovery.

We look forward to your guidance on the foregoing.

Best Regards,
Cathy Hinger

From: Hinger, Cathy

Sent: Thursday, February 22, 2024 2:52 PM

To: Mervis, Michael T. <MMervis@proskauer.com>; 'Maura Grossman'

<maura.grossman@uwaterloo.ca>; Gallagher, Katie <Katie.Gallagher@wbd-us.com>

Cc: Weaver, Kurt <Kurt.Weaver@wbd-us.com>; Bruno, Victoria <Victoria.Bruno@wbd-us.com>;

Ames, Lela <Lela.Ames@wbd-us.com>; Baker, Jeremy <Jeremy.Baker@wbd-us.com>;

audley@chapman.com; Mia D. D'Andrea <dandrea@chapman.com>; Nemith, Mike

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<AGordon@proskauer.com>

Subject: RE: Craigville Telephone Co. et al v. T-Mobile USA, Inc. - Plaintiffs' Motion to Restore Rule 30(b)(6) Time and to Compel TMUS to Reproduce Prepared Rule 30(b)(6) Witnesses on Matters 12(a) and 41

Dear Dr. Grossman,

I am writing to update you that Mr. Mervis and I have been meeting and conferring today about the deposition disputes referenced below and are exploring ways in which we may be able to resolve some of the disputes below. We will endeavor to advise you of such by tomorrow so that you do

not unnecessarily incur time.

Best Regards,
Cathy Hinger

From: Hinger, Cathy <Cathy.Hinger@wbd-us.com>

Sent: Thursday, February 22, 2024 12:07 PM

To: Mervis, Michael T. <MMervis@proskauer.com>; 'Maura Grossman'

<maura.grossman@uwaterloo.ca>; Gallagher, Katie <Katie.Gallagher@wbd-us.com>

Cc: Weaver, Kurt <Kurt.Weaver@wbd-us.com>; Bruno, Victoria <Victoria.Bruno@wbd-us.com>;

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<jroche@proskauer.com>; Alladi, Om V. <OAlladi@proskauer.com>; Gordon, Amy B.

<AGordon@proskauer.com>

Subject: RE: Craigville Telephone Co. et al v. T-Mobile USA, Inc. - Plaintiffs' Motion to Restore Rule 30(b)(6) Time and to Compel TMUS to Reproduce Prepared Rule 30(b)(6) Witnesses on Matters 12(a) and 41

Dear Dr. Grossman,

Please accept the following as Plaintiffs' Reply to TMUS's Opposition to Plaintiffs' Request for Expedited Consideration of their Motion to Restore 30(b)(6) time and to Compel Re-Designation of witnesses in advance of upcoming 30(b)(6) depositions.

Plaintiffs assert completion of their 30(b)(6) deposition of TMUS should be a high priority. Litigation over TMUS's 30(b)(6) deposition has been ongoing since the Special Master took it up at the 12/4 Special Master Hearing. It is now more than 2 months later and at least 4 more sessions remain, and several other Matters are unresolved with designees yet to be made on those topics. The main 30(b)(6) deposition session that has occurred since the 12/4 hearing (Sukhi Nehra) resulted in significant prejudice to Plaintiffs' remaining time. In total, Plaintiffs have had to manage their 7 hours of 30(b)(6) deposition of TMUS across at least 7 different witnesses. TMUS's suggestion that if the Court restores time after it briefs this issue on March 8, the same day as several other 30(b)(6) sessions, Plaintiffs can use the time thereafter does not address whether TMUS will then re-produce the same witnesses again so we may use the restored time on the topics they were compressed on due to the prior lack of preparation. TMUS's standing position in this case has been that it will only produce witnesses once. And, it would be costly to reconvene court reporters and the same witnesses again after the Special Master rules on whether TMUS's witnesses were not adequately prepared. This is why Plaintiffs seek expedited review.

To resolve this issue, and given the backlog of other motions for the Special Master to resolve, including the motion to compel against Inteliquent which we need resolved in order to take its depositions which Plaintiffs noticed for March 13 – 15th, Plaintiffs

would be willing to reschedule the remaining 30(b)(6) sessions presently scheduled for March 8th to a date to be calendared by TMUS ***promptly*** upon the Special Master's resolution of the Plaintiffs' motion seeking restoration of 30(b)(6) time, if, due to Mr. Mervis' trial, TMUS needs until March 8th to respond. However, if TMUS takes the position that such depositions cannot be rescheduled prior to March 18th, Plaintiffs assert fact discovery should not be extended generally, the parties should not be permitted to initiate new written or deposition discovery after March 18th, and that such dates only be used out of time to accommodate TMUS's request below for time to accommodate its counsel's trial schedule and upon showing of good cause by TMUS concerning any alleged unavailability of witnesses.

Additionally, regarding TMUS's Points below:

Point 1: Resolution of TMUS's motion to compel damages disclosures should be addressed after Plaintiffs' Motion to Compel against Inteliquent and completion of the TMUS 30(b)(6) depositions and Plaintiffs' motion regarding the return of time. Both sets of depositions will continue to cover fact discovery Plaintiffs seek from Inteliquent and TMUS regarding information necessary to Plaintiffs' development of an expert model for class wide damages.

Point 2: TMUS exhausted its time with Plaintiff Craigville's 30(b)(6) witness, then asked for more time. Plaintiffs' are approaching this from the opposite direction by seeking to avoid exhaustion of 30(b)(6) time before hit happens, so witnesses are not being deposed twice.

Point 3: Please note that at the January 19 hearing, neither party asked for a briefing schedule. Rather, the Special Master *sua sponte* ruled that the parties follow the same schedule set for TMUS's motion for additional time to depose Craigville, which is described below.

Point 4: Please note that at the January 19 hearing, TMUS asked for 10 days to submit its motion on January 29. Plaintiffs asked for a similar amount of time – 11 days – to submit its opposition on February 9. TMUS then asked for 7 days to submit its reply on February 16.

Plaintiffs also note that Plaintiffs have not agreed to take Satish Pachalla's deposition on February 29th. It is noticed for March 1 and if necessary March 4. Plaintiffs will further address this dispute with TMUS offline.

Plaintiffs are available this afternoon or tomorrow for a scheduling conference to the extent the Special Master may find such conversation useful, as we note we have also Noticed the deposition of Manoj Kumar for next Tuesday and TMUS has not changed the position conveyed by Mr. Alladi last Friday that it will not produce him on that date, nor have they provided another date before March 18 for his individual deposition.

Best Regards,

Cathy Hinger

Cathy Hinger

She/Her

Partner

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From: Mervis, Michael T. <MMervis@proskauer.com>

Sent: Thursday, February 22, 2024 9:49 AM

To: 'Maura Grossman' <maura.grossman@uwaterloo.ca>; Gallagher, Katie <Katie.Gallagher@wbd-us.com>

Cc: Hinger, Cathy <Cathy.Hinger@wbd-us.com>; Weaver, Kurt <Kurt.Weaver@wbd-us.com>; Bruno, Victoria <Victoria.Bruno@wbd-us.com>; Ames, Lela <Lela.Ames@wbd-us.com>; Baker, Jeremy <Jeremy.Baker@wbd-us.com>; audley@chapman.com; Mia D. D'Andrea <dandrea@chapman.com>; Nemith, Mike <Mike.Nemith@wbd-us.com>; Vinti, Baldassare <BVinti@proskauer.com>; Roche, Jennifer L. <jroche@proskauer.com>; Alladi, Om V. <OAlladi@proskauer.com>; Gordon, Amy B. <AGordon@proskauer.com>

Subject: RE: Craigville Telephone Co. et al v. T-Mobile USA, Inc. - Plaintiffs' Motion to Restore Rule 30(b)(6) Time and to Compel TMUS to Reproduce Prepared Rule 30(b)(6) Witnesses on Matters 12(a) and 41

Dr. Grossman – Plaintiffs seek expedited consideration of their latest motion, which asks you to rule they are entitled to more time to for their 30(b)(6) deposition because, allegedly, two T-Mobile witnesses were unprepared on certain matters. The reason given for expedition is that several depositions on 30(b)(6) topics are upcoming (they are scheduled for February 29 and March 1, 8, and 15) and plaintiffs want to know how much time they have left to use.

The request for expedition presupposes that the motion has merit, which is something you will only determine after full briefing (T-Mobile believes the motion lacks merit). In any case, *if* plaintiffs prevail in whole or in part, they can use any restored time as they wish. They have no pressing need for a ruling prior to the upcoming depositions. In short, there is no exigency that requires expedited treatment.

In fact, there are four T-Mobile motions currently pending before you for consideration, all of which have been fully briefed and all of which T-Mobile considers to be very important, especially given the upcoming discovery cut-off. They are:

1. Motion to Compel Rule 26(a)(1)(A)(iii) Damages Information
 1. Briefing was initially completed on **June 30, 2023**. However, on January 10, 2024, T-Mobile filed a supplemental brief informing the Special Master of new information which contradicted plaintiffs' representations in their opposition. Plaintiffs requested and received over a month to respond, and briefing was completed on **February 13, 2023**.
 2. When plaintiffs requested a month to respond, TMUS agreed but asked that the Special Master prioritize resolution of this motion once she had completed any task she was already working on. See attached email thread.
2. Motion to Compel Additional Testimony on Rule 30(b)(6) Topic 7
 1. Briefing was completed on **February 2, 2024**.
3. Motion to Compel Plaintiffs to Designate a Witness to Testify about Topics 8(b), 18, 19, 21, 22
 1. Briefing was completed on October 13, 2023. Hearing was held on January 19, 2024. Based on the Special Master's ruling, T-Mobile submitted revised Topics 21 and 22 and briefing on those topics was completed on **February 16, 2024**. Plaintiffs requested and received 11 days to respond.
4. Motion for Additional Time to Complete its 30(b)(6) Deposition of Plaintiff Craigville
 1. Briefing was completed on **February 16, 2024**. Plaintiffs requested and received 11 days to respond.

Additionally, just as plaintiffs' counsel told you several times last week that they were very busy (see attached), we are too. I am preparing (or at least trying to prepare) for a trial commencing March 4. In the next two weeks we have the following in this case:

February 29 and March 1: Deposition of TMUS Employee Satish Pachalla (30(b)(6) and 30(b)(1))

March 4: [*Tentatively agreed upon with plaintiffs*] Opening brief regarding plaintiffs' challenges to certain of TMUS's privilege log entries

March 8: Deposition of TMUS Employee Rusty Huntsman (30(b)(6))

March 8: Deposition of TMUS Employee William Rowe (30(b)(6))

March 11: [*Tentatively agreed upon with plaintiffs*] Reply brief regarding plaintiffs' challenges to certain of TMUS's privilege log entries

March 15: Deposition of TMUS Employee Tom Cast (30(b)(6))

March 15: TMUS's written responses and objections to plaintiffs' Fourth RFPs

In light of the foregoing, T-Mobile respectfully requests that its opposition to plaintiffs' latest

motion be due on March 8.

Thank you for your consideration.

Michael T. Mervis
Member of the Firm

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greenspaces
Please consider the environment before printing this email.

From: Maura Grossman <maura.grossman@uwaterloo.ca>

Sent: Wednesday, February 21, 2024 4:31 PM

To: Mervis, Michael T. <MMervis@proskauer.com>; 'Gallagher, Katie' <Katie.Gallagher@wbd-us.com>

Cc: Hinger, Cathy <Cathy.Hinger@wbd-us.com>; Weaver, Kurt <Kurt.Weaver@wbd-us.com>; Bruno, Victoria <Victoria.Bruno@wbd-us.com>; Ames, Lela <Lela.Ames@wbd-us.com>; Baker, Jeremy <Jeremy.Baker@wbd-us.com>; audley@chapman.com; Mia D. D'Andrea <dandrea@chapman.com>; Nemith, Mike <Mike.Nemith@wbd-us.com>; Vinti, Baldassare <BVinti@proskauer.com>; Roche, Jennifer L. <jroche@proskauer.com>; Alladi, Om V. <OAlladi@proskauer.com>; Gordon, Amy B. <AGordon@proskauer.com>

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This email sent by maura.grossman@uwaterloo.ca originated from outside the Firm.

OK, thank you.

From: Mervis, Michael T. <MMervis@proskauer.com>

Sent: Wednesday, February 21, 2024 3:08 PM

To: 'Gallagher, Katie' <Katie.Gallagher@wbd-us.com>; Maura Grossman <maura.grossman@uwaterloo.ca>

Cc: Hinger, Cathy <Cathy.Hinger@wbd-us.com>; Weaver, Kurt <Kurt.Weaver@wbd-us.com>; Bruno, Victoria <Victoria.Bruno@wbd-us.com>; Ames, Lela <Lela.Ames@wbd-us.com>; Baker, Jeremy <Jeremy.Baker@wbd-us.com>; audley@chapman.com; Mia D. D'Andrea <dandrea@chapman.com>;

Nemith, Mike <Mike.Nemith@wbd-us.com>; Vinti, Baldassare <BVinti@proskauer.com>; Roche, Jennifer L. <jroche@proskauer.com>; Alladi, Om V. <OAlladi@proskauer.com>; Gordon, Amy B. <AGordon@proskauer.com>

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Dr. Grossman – Our team is tied up on several pressing matters today, including preparing a response to plaintiffs' letter regarding Mr. Kumar. We respectfully request that you permit us an opportunity to respond to plaintiffs' request for expedition before setting a briefing schedule. We will provide our response and a proposal regarding a schedule by no later than tomorrow morning.

Thank you.

Michael T. Mervis
Member of the Firm
Litigation Department Vice Chair
Commercial Litigation Group Head

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From: Gallagher, Katie <Katie.Gallagher@wbd-us.com>

Sent: Wednesday, February 21, 2024 2:29 PM

To: Maura Grossman <maura.grossman@uwaterloo.ca>

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Subject: Craigville Telephone Co. et al v. T-Mobile USA, Inc. - Plaintiffs' Motion to Restore Rule 30(b)(6) Time and to Compel TMUS to Reproduce Prepared Rule 30(b)(6) Witnesses on Matters 12(a) and 41

This email sent by katie.gallagher@wbd-us.com originated from outside the Firm.

Dear Dr. Grossman,

Please find attached Plaintiffs' Letter Brief In Support of their Motion to Restore All of Plaintiffs' Time

Spent on Rule 30(b)(6) Questioning of TMUS's Witness Who Was Not Prepared on Matters 12(a) and 41, and to Compel TMUS to Reproduce Prepared Rule 30(b)(6) Witness on Matters 12(a) and 41, supporting exhibits cited in Plaintiffs' Letter Brief, and appendix of cases cited in Plaintiffs' Letter Brief. The cases are saved as a combined PDF document with bookmarks to each individual case.

As indicated in our Letter Brief, Plaintiffs are respectfully requesting expedited consideration of this Motion because there are remaining 30(b)(6) Matters on which TMUS has designated four different witnesses, and Plaintiffs need to know how much time they have remaining in total to allocate fairly across the remaining witnesses. From our meet and confers, Plaintiffs understand that TMUS does not agree with Plaintiffs' request for expedited consideration and thus the parties have not agreed to a briefing schedule.

We will also be sending you hard copies of these materials via FedEx. Should you have any questions, or have any issues accessing the documents, please do not hesitate to contact us.

Best Regards,

Katie Gallagher

Katie Gallagher

She/Her

Of Counsel

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